

KTBS LAW LLP  
1801 CENTURY PARK EAST, TWENTY-SIXTH FLOOR  
LOS ANGELES, CALIFORNIA 90067  
TELEPHONE: 310-407-4000

1 David M. Stern (CA Bar No. 67697)  
dstern@ktbslaw.com  
2 Thomas E. Patterson (CA Bar No. 130723)  
tpatterson@ktbslaw.com  
3 Samuel M. Kidder (CA Bar No. 284015)  
skidder@ktbslaw.com  
4 KTBS LAW LLP  
5 1801 Century Park East, 26th Floor  
Los Angeles, California 90067  
6 Telephone: (310) 407-4065  
7 Facsimile: (310) 407-9090

8 *Attorneys for Defendants MPT of*  
*Los Angeles, L.P., MPT of Olympia, LLC,*  
9 *MPT Operating Partnership, L.P., and*  
10 *Medical Properties Trust, Inc.*

11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA**

13 UNITED STATES OF AMERICA,  
14  
15 Plaintiff,

16 v.

17 OLYMPIA HEALTH CARE LLC,  
18 ALECTO HEALTHCARE SERVICES,  
LLC, MPT OF LOS ANGELES, L.P.,  
19 MPT OF OLYMPIA, LLC, MPT  
OPERATING PARTNERSHIP, L.P.,  
20 MEDICAL PROPERTIES TRUST,  
INC., SHERMAN/GRAYSON  
21 HOSPITAL, LLC, ALECTO  
HEALTHCARE SERVICES  
22 SHERMAN, LLC, LAXMAN REDDY,  
23 MATTHEW WILLIAMS, and  
JEREMY REDIN,  
24

25 Defendants.  
26  
27  
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Case No. 2:23-cv-01783-ODW-PVC

**STIPULATION TO FURTHER  
EXTEND TIME FOR MPT  
DEFENDANTS TO RESPOND TO  
INITIAL COMPLAINT**

Complaint Served (Waiver of  
Service Executed): March 13, 2023  
Current Response Date: July 24, 2023  
New Response Date: Sept. 7, 2023

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1 Plaintiff United States of America (“Plaintiff”) and Defendants MPT of Los  
2 Angeles, L.P., MPT of Olympia, LLC, MPT Operating Partnership, L.P., and  
3 Medical Properties Trust, Inc. (the “MPT Defendants” and, together with the  
4 Plaintiff, the “Parties”) by and through their undersigned counsel, hereby stipulate  
5 and agree as follows:

6 WHEREAS, Plaintiff filed the Complaint [Docket No. 1] (“Complaint”) on  
7 March 9, 2023 and sent the Complaint to the MPT Defendants with a Notice of  
8 Lawsuit and Request for Waiver of Service of Summons on March 13, 2023;

9 WHEREAS, the MPT Defendants returned an executed Waiver of Service of  
10 Summons on March 13, 2023, which was filed with the Court on May 5, 2023  
11 [Docket No. 14];

12 WHEREAS, based on the MPT Defendants’ waivers of service, the MPT  
13 Defendants’ initial responsive pleading deadline was May 12, 2023;

14 WHEREAS, the Parties held a meet and confer call on May 4, 2023,  
15 regarding the MPT Defendants’ intent to file a motion to dismiss the Complaint as  
16 against them pursuant to Fed. R. Civ. P. 12(b)(6);

17 WHEREAS, following their initial meet and confer call, the Parties stipulated,  
18 pursuant to Rule 8-3 of the Local Civil Rules, to extend the time for the MPT  
19 Defendants to answer or otherwise respond to the Complaint to June 9, 2023  
20 [Docket No. 15], and subsequently stipulated to further extend such deadline to  
21 July 24, 2023 [Docket Nos. 20 & 21];

22 WHEREAS, the Parties have continued to exchange information and remain  
23 engaged in discussions regarding a potential resolution that would either obviate the  
24 MPT Defendants’ potential motion to dismiss or narrow the scope of the issues in  
25 dispute;

26 WHEREAS, on July 10, 2023, Defendants Alecto Healthcare Services, LLC  
27 and Sherman/Grayson Hospital, LLC (together, the “Debtor-Defendants”) filed  
28

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1 Notices of Suggestion of Pendency of Bankruptcy and Automatic Stay of  
2 Proceedings [Docket Nos. 24 & 25];

3 WHEREAS, also on July 10, 2023, the Court entered a Minute Order [Docket  
4 No. 26] ordering the parties to meet and confer concerning the proposed handling of  
5 this action in light of the automatic stay and to submit a joint status report setting  
6 forth their proposal no later than July 31, 2023;

7 WHEREAS, the Parties believe good cause exists to further extend the  
8 deadline for the MPT Defendants to respond to the Complaint because the filing of  
9 the MPT Defendants' motion to dismiss on or before the current July 24, 2023  
10 deadline (and the briefing in connection therewith) would distract from the Parties'  
11 efforts to consensually resolve the motion to dismiss and their efforts to meet and  
12 confer regarding the proposed handling of this action in light of the Debtor-  
13 Defendants' pending bankruptcy cases;

14 WHEREAS, this stipulation is made in good faith and not for the purpose of  
15 delay or for any other improper purpose; and

16 WHEREAS, no discovery cut-off date, pretrial conference date, or trial date  
17 has been set, and only two prior extensions of the deadline to respond to the  
18 Complaint have been granted (one of which was an extension of less than 30 days  
19 pursuant to Local Rule 8-3).

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED  
2 between the Parties, by and through their counsel of record, as follows:

3 1. The deadline for the MPT Defendants to file their response to the  
4 Complaint is extended from July 24, 2023 to September 7, 2023.

5 IT IS SO STIPULATED.

6 Dated: July 18, 2023

KTBS LAW LLP

7  
8 By: /s/ Samuel M. Kidder  
9 Samuel M. Kidder (CA Bar No.  
284015)

10 Attorneys for Defendants MPT of Los  
11 Angeles, L.P., MPT of Olympia, LLC  
12 MPT Operating Partnership, L.P., and  
13 Medical Properties Trust, Inc.

14 Dated: July 18, 2023

UNITED STATES OF AMERICA

15  
16 By: /s/ John R. Kresse  
17 John R. Kresse  
18 Trial Attorney  
19 United States Department of Justice

20 Attorneys for United States of  
21 America  
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**ATTESTATION**

Pursuant to Local Civil Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 18, 2023

KTBS LAW LLP

By: /s/ Samuel M. Kidder  
Samuel M. Kidder (CA Bar No.  
284015)

Attorneys for Defendants MPT of Los  
Angeles, L.P., MPT of Olympia, LLC  
MPT Operating Partnership, L.P., and  
Medical Properties Trust, Inc.